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10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 VICTOR DEGUZMAN, an individual,) Case No.: 12CV2064-JM-DHB
13)
14 Plaintiff) **Joint Motion to Dismiss**
15)
16 v.)
17)
18 LEGAL RECOVERY LAW OFFICES,)
19 INC., a Corporation; MIDLAND)
20 FUNDING, LLC; MIDLAND CREDIT)
21 MANAGEMENT, INC. and DOES 1)
22 through 10 inclusive,)
23)
24 Defendants.)
25)
26

27 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Local Rule 7.2,
28 Plaintiff VICTOR DEGUZMAN and Defendants LEGAL RECOVERY LAW OFFICES,
29 INC., MIDLAND FUNDING, LLC, and MIDLAND CREDIT MANAGEMENT, INC.
30 jointly move the Court to dismiss the entire action and all parties with prejudice. The parties
31 are to bear their costs and fees.

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2 Respectfully submitted,
3

4 DATE: August 22, 2013 BY: /s/ Jeremy S. Golden
5 Jeremy S. Golden,
6 Attorney for Plaintiff Victor DeGuzman
7 Email: Jeremy@goldencardona.com
8

9 DATE: August 22, 2013 BY: /s/David Cotter
10 David Cotter
11 Attorney for Defendant LRLO
Email:d.cotter1@cox.net
12

13 DATE: August 22, 2013 BY: /s/Todd F. Stevens
14 Todd F. Stevens
15 Attorney for Defendant Midland
Email: tstevens@keenlaw.com
16

SIGNATURE CERTIFICATION

17 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and
18 Procedures Manual, I hereby certify that the content of this document is acceptable to David
19 Cotter, counsel for Defendant LEGAL RECOVERY LAW OFFICES, INC. and Todd F.
20 Stevens, counsel for Defendant MIDLAND FUNDING, LLC, and MIDLAND CREDIT
21 MANAGEMENT, INC., and that I have obtained their authorization to affix their electronic
22 signatures to this document.
23
24

25 DATE: August 22, 2013 BY: /s/ Jeremy S. Golden
26 Jeremy S. Golden,
27 Attorney for Plaintiff Victor DeGuzman
28 Email: Jeremy@goldencardona.com